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D.C. Eastern

FILED

AUG - 6 2020

IN The United States District Court
 Eastern District of Oklahoma

PATRICK ALANBY
 Clerk, U.S. District Court

By Deputy Clerk

Daniel Johnson
 Plaintiff/Proes
 v.

ca. # CIV-18-00152

Marty Garrison et al.
 Defendant

Motion for request to
 produce "Digital recording"
 Under OP'S 040117 III. requesting
 IG investigation (G)

Now comes, pro-se litigant; Plaintiff Daniel Johnson
 Under Hall v. Bellmon, 935 F.2d 1106, 1110 (10th. cir. 1991).
 Pro-se litigant will now present the reason for
 said request to produce "Digital Recording".

(1.) "Under OP'S 040117 III. requesting IG investigation (G)
 Plaintiff would like to direct the court to the attention
 of defense exhibit 4 Labeled "investigation record" to
 Where the seventh paragraph of defense exhibit that
 states MR. Garrison "interviewed" Inmate Daniel Johnson
 #506753 on 3-10-16. MR. Garrison asserts
 that MR. Johnson refused to write a statement but
 earlier on in the paragraph also said MR. Johnson didn't want
 to follow the grievance process but it's funny how inmate
 Johnson was able to properly exhaust his exhausted claim;
 Plaintiff, MR. Johnson is just introducing to the court the
 inconsistency of speech in MR. Garrison's statements that
 may be the reason why this court would want to review
 the record a little more thoroughly.

Pro-se litigant "avers" that on 3-10-16 he was
interviewed by MR. Garrison and MR. Yandale

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and the way to verify Plaintiff declaration [if] this honorable court would review the "Digital recording" as stated: in OP's 040117 "investigation" III. requesting 1G investigation (G); use of recording devices: "Digital recordings will be made for all persons interviewed for purposes of an investigation and will be available for review in info share. Interviewers are not allowed to use personal audio or video recorders during the interview.

In the same section III. requesting 1G investigations (E)(2) "Interviews and Evidence"; it goes to read: "A summary of all interviews and evidence relied upon in the investigation and limited to the fact's necessary and relevant to the findings of any recommendations to change policy, any and all state/federal statute violations, and/or any and all policy and procedure violations.

Additionally, the summary of each relevant interview shall include a brief statement indicating where and when the interview took place and everyone present during the interview."

If such a recommendation and order be granted to "produce the digital recording" it could clear up for the court the where the interview took place, and who was all present during the time Plaintiff agreed to write a incident report statement to the alleged act's that occur on 2-16-16 in Yw Bonners Office and to the 1-13-16 rotunda offensive commit.

The purpose of the digital recording is for the reviewing for relevant fact findings and potential

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litigation purposes to prove [if] pro-se litigant by a preponderance of evidence substantiated the alleged events by reviewing for info share; the consistency of statements made on incident report or to ensure that the investigation was in no way coerced by any person(s) that may be present during such interview.

Under OKla. policy 040117 "Investigation" III. requesting IG investigation (G), use of recording devices authorize this court to review such recordings for the purpose of info share.

Pro-se litigant, MR. Johnson request respectfully Under Hall v. Bellman, of investigation in matters for info share for a better determination.?

Plaintiff, MR. Johnson ask the court if said motion above be granted to please send a transcript of or allow pro-se litigant to listen along by telephone.?

Certificate of Mailing

I, Daniel Johnson, hereby certify that on the 3rd day of Aug., 2020, I mailed a true and correct copy of the foregoing instrument entitled Motion for request of Digital Recording with prepaid postage affixed thereon to the following interested parties to wit, by placing said document into the custody and control of the William S. Key Correctional Center Legal mailing Supervisor MRS. Edwards to be mailed without delay to the following:

U.S. District Court

Eastern Dist. of Okla.

P.O. Box 607

Muskogee, OK, 74402.

Daniel Johnson
#500753 / D-3-40